

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1	
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In Re: Garces Restaurant Group, Inc., d/b/a Garces Group, <i>et al.</i> , ¹ Debtors.	Case No.: 18-19054 (JNP) (Jointly Administered) Chapter: 11 Hearing Date and Time: September 6, 2018 at 2:00 p.m.

**M&T BANK’S LIMITED OBJECTION TO FIRST INTERIM FEE
APPLICATION OF EISNERAMPER LLP AS FINANCIAL ADVISOR AND
ACCOUNTANT TO DEBTORS FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF OUT OF POCKET EXPENSES INCURRED
FOR THE PERIOD MAY 2, 2018 THROUGH JULY 20, 2018 [DOCKET NO. 421]**

M&T Bank, also known as Manufacturers and Traders Trust Company (the “Bank” or “M&T Bank”), by and through its undersigned counsel, hereby files this limited objection (the “Objection”) to the First Interim Fee Application Of EisnerAmper LLP as Financial Advisor and Accountant To Debtors For Allowance Of Compensation And Reimbursement Of Out Of Pocket

¹ The Debtors in these Chapter 11 Cases and the last four digits of their employee identification numbers are: GRGAC1, LLC d/b/a Amada (7047); GRGAC2, LLC d/b/a Village Whiskey (7079); GRGAC3, LLC d/b/a Distrito Cantina (7109); GRGAC4, LLC (0542); Garces Restaurant Group, Inc. d/b/a Garces Group (0697); Latin Valley 2130, LLC; La Casa Culinary, LLC d/b/a Amada Restaurant (4127); Garces Catering 300, LLC d/b/a Garces Catering (3791); Latin Quarter Concepts, LLC d/b/a Tinto d/b/a Village Whiskey (0067); UrbanFarm, LLC d/b/a JG Domestic (3014); GR300, LLC d/b/a Volver (0347); GRG2401, LLC (7222); GRGChubb1, LLC (8350); GRGKC1, LLC; GRGWildwood, LLC (9683); GRGNY2, LLC (0475); GRGDC2, LLC d/b/a Latin Market (8878); GRGBookies, LLC d/b/a The Olde Bar (4779); and GRGAC5, LLC (9937).

Expenses Incurred For The Period May 2, 2018 Through July 20, 2018, (the “Fee Application”), filed on August 7, 2018 [Docket No. 421], and respectfully represents as follows:²

LIMITED OBJECTION

1. On May 2, 2018 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under Chapter 11 of United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), commencing their Chapter 11 cases in the United States Bankruptcy Court for the District of New Jersey (the “Court”). The Debtors’ Chapter 11 cases are being jointly administered pursuant to an order of the Court dated May 4, 2018 [Docket No. 25].

2. On July 11, 2018, the Court entered an Order (I) Approving Asset Purchase Agreement And Authorizing The Sale Of Certain Assets Of The Debtors Ouotside of the Ordinary Course of Business; (II) Authorizing The Sale of Assets Free And Clear Of All Liens, Claims And Interests; (III) Authorizing The Assumption And Assignment Or Rejection Of Certain Executory Contracts And Unexpired Leases; (IV) Approving A Compromise And Settlement Pursuant To Bankruptcy Rule 9019 As Embodied By The Term Sheet; (V) Providing For Distribution Of Funds; And (VI) Granting Related Relief [Docket No. 403] (the “Sale/Settlement Order”).

3. M&T Bank left behind a portion of the sales proceeds (\$2,000,000.00) for the benefit of the Debtors’ Estates to assist the Debtors’ Estates to pay authorized PACA claims, if any, administrative claims (non-professional fees), priority claims and professional fees, based on representations of the Debtor’s representatives that such funds would be sufficient to pay such claims in full, or in such amounts agreed upon by the individual claimants.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Fee Application.

4. The total amount thus far requested by estate professionals is in excess of \$2,000,000.00. In fact, at this time, the full amount due to administrative creditors (estate professionals and otherwise) and priority creditors is unknown. Accordingly, M&T submits that the approval and authority to pay any estate professional's administrative claims at this time is premature. Consequently, M&T Bank objects to the consideration and allowance of professional fees until the Debtors provide an update and status and strategy as to the "go forward" game plan regarding the Debtors' bankruptcy cases.

RESERVATION OF RIGHTS

5. M&T Bank preserves its rights and remedies as it concerns the Fee Application and the relief requested therein, and reserves its rights to raise any additional objections thereto at or before the hearing.

WHEREFORE, M&T Bank respectfully requests that the Court (a) deny the relief requested in the Fee Application, at this time, without prejudice, (b) grant such other and further relief as this Court deems just and proper.

GREENBERG TRAURIG, LLP

Date: August 27, 2018

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